STATEMENT OF BASIS (AI No. 3236)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0124583** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Kinder Morgan Liquids Terminals, LLC
Kinder Morgan Seven Oaks, LLC
106 Bridge City Avenue
Westwego, LA 70094

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: June 25, 2009

1. PERMIT STATUS

A. Reason For Permit Action:

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term. Kinder Morgan purchased this facility from Vopak Terminal Westwego, Inc. Stormwater runoff from the Seven Oaks Terminal is currently covered under Multi-Sector General Permit LAR05N906. Due to the nature of chemicals stored on site and because Kinder Morgan proposes to expand the product line in the future, an individual permit is being issued. Sanitary wastewater currently covered under LAG533045 and the stormwater currently covered under LAR05N906 are included in the individual permit.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits – LAR05N906
LPDES permit effective date: November 7, 2007
LPDES permit expiration date: April 30, 2011

LAG533045
LPDES permit effective date: February 25, 2009
LPDES permit expiration date: November 30, 2012

D. Date Application Received: March 4, 2009; additional information received on June 8, 2009.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - bulk liquid storage terminal

According to this application and a Notice of Intent to Discharge Sanitary Wastewater which was received on January 23, 2009, the Kinder Morgan Seven Oaks Terminal is a chemical/material storage and transfer facility. Various liquid products (see Appendix A) are received via pipeline, railcar, tank truck, and marine vessel, stored, then shipped out in the same manner as received. There are approximately 19 bulk storage tanks onsite.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4226

C. LOCATION - 106 Bridge City Avenue, in Westwego, Jefferson Parish
Latitude 29° 55' 28", Longitude 90° 08' 43"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: stormwater runoff from the diked tank farm storage areas and truck and railcar loading areas, washdown water, and previously monitored effluent from Outfall 101
Treatment: settling
Location: at the point of discharge to the ditch located on the south side of the facility, prior to combining with other waters (Latitude 29° 55' 16", Longitude 90° 08' 56")
Flow: intermittent
Discharge Route: via pipe to local drainage, thence to Bayou Segnette

Outfall 101

Discharge Type: hydrostatic test waters
Treatment: none
Location: at the point of discharge from the tank or vessel being tested, prior to combining with other waters
Flow: intermittent
Discharge Route: via Outfall 001 to local drainage, thence to Bayou Segnette

Outfall 002 (currently covered under LAG533045)

Discharge Type: treated sanitary wastewater
Treatment: aeration in MoDad unit followed by chlorination
Location: at the point of discharge from the sewage treatment facility, prior to combining with other waters (Latitude 29° 55' 27", Longitude 90° 08' 43")
Flow: less than 5000 GPD (estimated flow is 500 GPD)
Discharge Route: via pipe to local drainage, thence to Bayou Segnette

4. RECEIVING WATERS

STREAM – The physical location of the facility is within subsegment 020501 of the Barataria Basin. The facility's discharges are made via local drainage to Bayou Segnette, which is located in subsegment 020701 of the Barataria Basin.

BASIN AND SEGMENT - Barataria Basin, Segment 020701

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 020701, Bayou Segnette - from headwaters to Bayou Villars (020701), is listed on LDEQ's Final 2006 303(d) list as impaired for sulfates (EPA Category 5) due to drought related impacts. TMDLs have not yet been established for the sulfate impairments for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a future TMDL. Until completion of TMDLs for the Barataria Basin, those suspected causes for impairment which are not directly attributed to the bulk liquid storage terminal point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Sulfates are not among the effluent characteristics for the stormwater runoff, washdown water, and hydrostatic test water discharged through Outfall 001. The volume of discharge from Outfall 002 is an estimated 500 gallons per day and travels through local drainage before reaching Bayou Segnette. Therefore, the discharges from this facility should not cause or contribute to the sulfate impairment.

Subsegment 020701, Bayou Segnette - from headwaters to Bayou Villars (020701), was previously listed as impaired for organic enrichment/low DO (dissolved oxygen), pathogen indicators, Nitrate/Nitrite (Nitrite + Nitrate as N), and Phosphorus, for which the below TMDLs have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards. The following TMDLs have been established for subsegment 020701:

TMDL For Fecal Coliforms for Bayou Segnette, Louisiana (Subsegment 020701) was finalized on August 5, 2004. The Executive Summary states "Because permit limits for point source discharges of treated wastewater require them to meet water quality standards at the end of the pipe, the WLA for treated wastewater discharges consists of no reductions (both summer and winter).

Bayou Segnette TMDL for Biochemical Oxygen-Demanding Substances (Subsegment 020701) – Revised TMDL Report was finalized on July 30, 2004. A total of five National Pollutant Discharge Elimination System (NPDES) permits were identified within Subsegment 020701. Because none of these facilities discharges directly into Bayou Segnette, no point sources were included in the model. According to the TMDL report, "The nonconservative behavior of dissolved oxygen allows many small or remote point source dischargers to be assimilated by their receiving waterbodies before they reach the modeled waterbody. These dischargers are said to have very little to no impact on the modeled waterbody and, therefore, they are not included in the model and are not subject to any

reductions based on this TMDL. These facilities are permitted in accordance with state regulation and policies that provide adequate protective controls." Kinder Morgan Seven Oaks Terminal discharges treated sanitary wastewater, stormwater runoff, washdown waters, and hydrostatic test waters to local drainage then to Bayou Segnette. The volume of discharge of treated sanitary wastewater (Outfall 002) is too small to have a significant impact on the receiving stream. Standard BOD_5 limits included in the permit at Outfall 002 will address the potential for further impairment of this waterbody. Organic enrichment/low DO impairments will be addressed by the TOC parameter for Outfalls 001 and 101.

Nitrate/Nitrite (Nitrite + Nitrate as N) and Phosphorus

The *Bayou Segnette TMDL for Biochemical Oxygen-Demanding Substances (Subsegment 020701) – Revised TMDL Report* states "This subsegment was listed as impaired due to nutrients as well as organic enrichment/low DO. This TMDL establishes load limitations for oxygen-demanding substances and goals for reduction of those pollutants. LDEQ's position, as stated in the declaratory ruling issued by Dale Givens regarding water quality criteria for nutrients (Sierra Club v. Givens, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998), is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. The implementation of this TMDL through wastewater discharge permits and implementation of best management practices to control and reduce runoff of soil and oxygen-demanding pollutants from nonpoint sources in the watershed will also control and reduce the nutrient loading from those sources." Outfall 002 has the potential to discharge pollutants associated with the nutrients impairment.

LAC 33:IX.2707.C.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through a BOD_5 limitation. Compliance with the BOD_5 limitation as the indicator parameter will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with the effluent limitations of the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in Part II of the permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Changes from the previous permit - N/A; The facility does not currently have an individual permit.

7. COMPLIANCE HISTORY/COMMENTS

A. OEC – There are no open, appealed, or pending enforcement actions for this facility as of June 2, 2009.

B. DMR Review/Excursions – There are no DMRs on file for LAR05N906, effective November 7, 2007, or LAG533045, effective February 25, 2009

8. EXISTING EFFLUENT LIMITS

LAG533045 – treated sanitary wastewater

	Limitation		
	Monthly Avg	Weekly Avg	
Pollutant	mg/L		Frequency
Flow	---	Report	1/ 6 months
BOD_5	30	45	1/ 6 months
TSS	30	45	1/ 6 months
Oil & Grease	---	15	1/ 6 months
Fecal Coliform colonies/100ml	200	400 (Daily Max)	1/ 6 months
pH, s.u.	6.0 (min)	9.0 (max)	1/ 6 months

Stormwater runoff is covered under Multi-Sector General Permit LAR05N906.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020701 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written

comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Kinder Morgan Liquids Terminals, LLC

1. **Outfall 001** - stormwater runoff from the diked tank farm storage areas and truck and railcar loading areas, washdown water, and previously monitored effluent from Outfall 101 (flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
Flow-MGD	Report	Report	*; BPJ
TOC	---	50 mg/L	*;BPJ
Oil & Grease	---	15 mg/L	*; BPJ
Total BTEX [1]	---	250 ug/L	BPJ
pH	6.0 su	9.0 su	*; BPJ
METALS, CYANIDE, TOTAL PHENOLS			
Antimony [3]	---	600 ug/L	BPJ
Arsenic [3]	---	100 ug/L	BPJ
Beryllium [3]	---	100 ug/L	BPJ
Cadmium [3]	---	100 ug/L	BPJ
Chromium [3]	---	150 ug/L	BPJ
Copper [3]	---	500 ug/L	BPJ
Lead [1, 3]	---	150 ug/L	BPJ
Mercury [3]	---	10 ug/L	BPJ
Nickel [3]	---	500 ug/L	BPJ
Selenium [3]	---	100 ug/L	BPJ
Silver [3]	---	100 ug/L	BPJ
Thallium [3]	---	100 ug/L	BPJ
Zinc [3]	---	1000 ug/L	BPJ
Total Cyanide [3]	---	100 ug/L	BPJ
Total Phenols [2]	---	500 ug/L	BPJ
VOLATILE COMPOUNDS			
Acrolein [3]	---	100 ug/L	BPJ
Acrylonitrile [3]	---	100 ug/L	BPJ
Benzene [1, 3]	---	100 ug/L	BPJ
Bromoform [3]	---	100 ug/L	BPJ
Carbon Tetrachloride [3]	---	100 ug/L	BPJ
Chlorobenzene [3]	---	100 ug/L	BPJ
Chlorodibromomethane [3]	---	100 ug/L	BPJ
Chloroethane [3]	---	100 ug/L	BPJ
2-Chloroethyl Vinyl Ether [3]	---	100 ug/L	BPJ
Chloroform [3]	---	100 ug/L	BPJ
Dichlorobromomethane [3]	---	100 ug/L	BPJ
1,2-Dichlorobenzene [3]	---	100 ug/L	BPJ
1,3-Dichlorobenzene [3]	---	100 ug/L	BPJ
1,4-Dichlorobenzene [3]	---	100 ug/L	BPJ

1,1-Dichloroethane [3]	---	100 ug/L	BPJ
1,2-Dichloroethane [3]	---	100 ug/L	BPJ
1,1-Dichloroethylene [3]	---	100 ug/L	BPJ
1,2-Dichloropropane [3]	---	100 ug/L	BPJ
1,3-Dichloropropylene [3]	---	100 ug/L	BPJ
Ethylbenzene [3]	---	100 ug/L	BPJ
Methyl Bromide [3]	---	100 ug/L	BPJ
Methyl Chloride [3]	---	100 ug/L	BPJ
Methylene Chloride [3]	---	100 ug/L	BPJ
1,1,2,2-Tetra-Chloroethane [3]	---	100 ug/L	BPJ
Tetrachloroethylene [3]	---	100 ug/L	BPJ
Toluene [3]	---	100 ug/L	BPJ
1-2-Trans-Dichloroethylene [3]	---	100 ug/L	BPJ
1,1,1-Trichloroethane [3]	---	100 ug/L	BPJ
1,1,2-Trichloroethane [3]	---	100 ug/L	BPJ
Trichlorethylene [3]	---	100 ug/L	BPJ
Vinyl Chloride [3]	---	100 ug/L	BPJ
ACID COMPOUNDS			
Phenol [3]	---	100 ug/L	BPJ
2-Nitrophenol [3]	---	100 ug/L	BPJ
4-Nitrophenol [3]	---	100 ug/L	BPJ
2,4-Dinitrophenol [3]	---	100 ug/L	BPJ
4,6-Dinitro-o-Cresol [3]	---	100 ug/L	BPJ
P-Chloro-M-Cresol [3]	---	100 ug/L	BPJ
Pentachlorophenol [3]	---	100 ug/L	BPJ
2-chlorophenol [3]	---	100 ug/L	BPJ
2,4-Dichlorophenol [3]	---	100 ug/L	BPJ
2,4,6-Trichlorophenol [3]	---	100 ug/L	BPJ
2,4-Dimethylphenol [3]	---	100 ug/L	BPJ
BASE/NEUTRAL COMPOUNDS			
1,2-Diphenylhydrazine [3]	---	100 ug/L	BPJ
1,2,4-Trichlorobenzene [3]	---	100 ug/L	BPJ
2-Chloronaphthalene [3]	---	100 ug/L	BPJ
2,4-Dinitrotoluene [3]	---	100 ug/L	BPJ
2,6-Dinitrotoluene [3]	---	100 ug/L	BPJ
3,3'-Dichlorobenzidine [3]	---	100 ug/L	BPJ
3,4-Benzofluoranthene [3]	---	100 ug/L	BPJ
4-Bromophenyl Phenyl Ether [3]	---	100 ug/L	BPJ
4-Chlorophenyl Phenyl Ether [3]	---	100 ug/L	BPJ
Acenaphthene [3]	---	100 ug/L	BPJ
Acenaphthylene [3]	---	100 ug/L	BPJ
Anthracene [3]	---	100 ug/L	BPJ
Benzidine [3]	---	100 ug/L	BPJ

Benzo (a) Anthracene [3]	---	100 ug/L	BPJ
Benzo (a) Pyrene [3]	---	100 ug/L	BPJ
Benzo, (g,h,i) Perylene [3]	---	100 ug/L	BPJ
Benzo (k) Fluoranthene [3]	---	100 ug/L	BPJ
Bis (2-Chloroethoxy) Methane [3]	---	100 ug/L	BPJ
Bis (2-Chloroethyl) Ether [3]	---	100 ug/L	BPJ
Bis (2-Chloroisopropyl) Ether [3]	---	100 ug/L	BPJ
Bis (2-Ethylhexyl) Phthalate [3]	---	100 ug/L	BPJ
Butyl Benzyl Phthalate [3]	---	100 ug/L	BPJ
Chrysene [3]	---	100 ug/L	BPJ
Dibenzo (a,h) Anthracene [3]	---	100 ug/L	BPJ
Diethyl Phthalate [3]	---	100 ug/L	BPJ
Dimethyl Phthalate [3]	---	100 ug/L	BPJ
Di-N-Butyl Phthalate [3]	---	100 ug/L	BPJ
Di-N-Octyl Phthalate [3]	---	100 ug/L	BPJ
Fluoranthene [3]	---	100 ug/L	BPJ
Fluorene [3]	---	100 ug/L	BPJ
Hexachlorobenzene [3]	---	100 ug/L	BPJ
Hexachlorobutadiene [3]	---	100 ug/L	BPJ
Hexachlorocyclopentadiene [3]	---	100 ug/L	BPJ
Hexachloroethane [3]	---	100 ug/L	BPJ
Ideno (1,2,3-c,d) Pyrene [3]	---	100 ug/L	BPJ
Isophorone [3]	---	100 ug/L	BPJ
Naphthalene [3]	---	100 ug/L	BPJ
Nitrobenzene [3]	---	100 ug/L	BPJ
N-Nitrosodimethylamine [3]	---	100 ug/L	BPJ
N-Nitrosodi-n-propylamine [3]	---	100 ug/L	BPJ
N-Nitrosodiphenylamine [3]	---	100 ug/L	BPJ
Phenanthrene [3]	---	100 ug/L	BPJ
Pyrene [3]	---	100 ug/L	BPJ
PESTICIDES/HERBICIDES			
Alpha-Endosulfan [3]	---	10 ug/L	BPJ
Beta-Endosulfan [3]	---	10 ug/L	BPJ
Endosulfan Sulfate [3]	---	10 ug/L	BPJ
Aldrin [3]	---	10 ug/L	BPJ
Alpha-BHC [3]	---	10 ug/L	BPJ
Beta-BHC [3]	---	10 ug/L	BPJ
Gamma-BHC [3]	---	10 ug/L	BPJ
Delta-BHC [3]	---	10 ug/L	BPJ
Dieldrin [3]	---	10 ug/L	BPJ
4,4'-DDE [3]	---	10 ug/L	BPJ
4,4'-DDD [3]	---	10 ug/L	BPJ
4,4'-DDT [3]	---	10 ug/L	BPJ
Heptachlor [3]	---	10 ug/L	BPJ

Endrin Aldehyde [3]	---	10 ug/L	BPJ
Heptachlor Epoxide [3]	---	10 ug/L	BPJ
Chlordane [3]	---	10 ug/L	BPJ
Toxaphene [3]	---	10 ug/L	BPJ
PCB-1242 [3]	---	[4]	BPJ
PCB-1254 [3]	---	[4]	BPJ
PCB-1221 [3]	---	[4]	BPJ
PCB-1232 [3]	---	[4]	BPJ
PCB-1248 [3]	---	[4]	BPJ
PCB-1260 [3]	---	[4]	BPJ
PCB-1016 [3]	---	[4]	BPJ
2,3,7,8-TCDD (Dioxin) [2]	---	5ug/L	BPJ
Endrin [3]	---	5ug/L	BPJ

BPJ Best Professional Judgement
su Standard Units

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

1. This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing liquid or gaseous hydrocarbons.

2. This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing any phenolic compound.

3. This parameter shall be monitored if the outfall could potentially be affected by the handling and/or storage of commodities containing this parameter.

4. There shall be no discharge of polychlorinated biphenyls (PCBs).

Treatment: none

Monitoring Frequency: flow, TOC, oil and grease, and pH shall be monitored 1/month.

All other parameters must be monitored once during each month in which the outfall could potentially be affected by handling and/or storing commodities containing one or more of the specified chemicals, and once a month for two months thereafter (e.g., if a commodity containing one or more of the specified chemicals is handled and/or stored within the tank farm, the specified parameter must be monitored at the outfall for the respective tank farm once during each month in which the specified chemical is handled and/or stored within that tank farm, and monitoring shall continue once per month for two months after the commodity is no longer handled and/or stored within that tank farm). If the effluent limitation is exceeded during either of these two additional months, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for the specified parameter shall cease.

Limits Justification: flow, TOC, oil and grease, and pH limits are based on LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

The Total Phenols parameter is included in the permit based on BPJ because the facility may handle and/or store commodities that contain phenolic compounds, and there is potential for leaks and spills during the transfer of the products. The effluent limit is based on current LDEQ practices.

All other parameters are included in the permit based on BPJ because of the potential for the facility to handle and/or store commodities containing metals, volatile compounds, acid compounds, base/neutral compounds and pesticides/herbicides, and because there is potential for leaks and spills during the transfer of the products. The effluent limitations are based on state empirical limitations and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos" and 40 CFR 442.1.b, "This part is not applicable to wastewaters resulting from cleaning the interiors of drums, intermediate bulk containers, or closed top hoppers." This facility does not clean tanks used to transport cargo.

2. **Outfall 101** – Hydrostatic Test Water (flow is intermittent)

	Limitation		
	Monthly Avg	Daily Max	
Pollutant (*1)	Mg/L (unless stated)		**Reference**
Flow	Report	Report	LAG670000
TSS (*2)	---	90	LAG670000
Oil & Grease	---	15	LAG670000
TOC	---	50	LAG670000
Benzene	---	50 µg/l	LAG670000
Total Lead	---	50 µg/l	LAG670000
BTEX	---	250 µg/l	LAG670000

1. Flow, TSS, and Oil and Grease shall be measured on discharges from all new and existing pipelines, flowlines, vessels, or tanks. In addition, Total Organic Carbon (TOC) shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have previously been in service; (i.e., those which are not new). Benzene, Total BTEX, and Total Lead shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.

2. Report the TSS concentration of the intake on the DMR along with the concentration of TSS in the effluent, if the effluent is being returned to the same water source from which the intake water was obtained. In these cases, concurrent sampling of the influent and the effluent is required, and the net value shall not exceed 90 mg/L.

Treatment: None

Monitoring Frequency: 1/discharge from each tank or vessel being tested.

Limits Justification: Limits and monitoring frequency are based on the Hydrostatic Test General Permit (LAG670000).

3. **Outfall 002** – Treated Sanitary Wastewater (flow is less than 5000 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	
BOD_5	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform, colonies/100ml	200	400	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

Treatment: aeration in MoDad unit followed by chlorination

Monitoring Frequency: 1/ 6 months for all parameters at the point of discharge from the STP prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

* Existing permits for similar outfalls

BPJ Best Professional Judgement
su Standard Units

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because there is a potential for storm water contamination from the loading and unloading of chemicals.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the Draft Permit).